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STATE OF ILLINOIS)

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

LAW DIVISION NORTHERN District
OF ILLINOIS ATTORNEY
DIVISIONALLYSON ALBRECHT, individually)
and as mother and best friend of)
RORY-MORRIS MARTIN ALBRECHT,)
a minor,

Plaintiff,)

vs.)

KNOWLEDGE LEARNING CORP,)
KNOWLEDGE LEARNING CENTERS,)
INC, KC DEVELOPMENT CORP.,)
KINDERCARE REAL ESTATE LLC.,)
KINDERCARE AND MS. CATHERINE)
RADER)

Defendants.)

No. 08 CV 3922

FILED

AUG 19 2008 TC

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MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURTFRIST AMENDED COMPLAINT

NOW COMES the Plaintiff, ALLYSON ALBRECHT, individually and as mother and best friend of RORY-MORRIS MARTIN ALBRECHT, and in complaining of the Defendants, KNOWLEDGE LEARNING CORP, KNOWLEDGE LEARNING CENTERS, INC, KC DEVELOPMENT CORP., KINDERCARE REAL ESTATE LLC., KINDERCARE AND MS. CATHERINE RADER, states as follows:

COUNT I

1. That at all times mentioned herein, one or more of the following Defendants KNOWLEDGE LEARNING CORP, KNOWLEDGE LEARNING CENTERS, INC, KC DEVELOPMENT CORP., KINDERCARE REAL ESTATE LLC., and KINDERCARE, owned and or operated business commonly know as Kindercare a child care facility located at 1050 Bonaventure Drive, Elk Grove Village, IL.
2. That on or about December 13, 2007 the minor Plaintiff, RORY-MORRIS MARTIN ALBRECHT, was in the care of one or more of the following Defendants, KNOWLEDGE LEARNING CORP, KNOWLEDGE LEARNING CENTERS, INC, KC

DEVELOPMENT CORP., KINDERCARE REAL ESTATE LLC., KINDERCARE and MS. CATHERINE RADER on the Kindercare premises located at 1050 Bonaventure Drive, Elk Grove Village, IL .

3. That at all times mentioned MS. CATHERINE RADER was the employee and agent of one or more of the Defendants, KNOWLEDGE LEARNING CORP., KNOWLEDGE LEARNING CENTERS, INC, KC DEVELOPMENT CORP., KINDERCARE REAL ESTATE LLC., KINDERCARE .

4. That at the same time and place, Ms. CATHERINE RADER tripped and fell and knocked a chair onto the minor, RORY-MORRIS MARTIN ALBRECHT injuring him.

5. That the Defendants, KNOWLEDGE LEARNING CORP, KNOWLEDGE LEARNING CENTERS, INC, KC DEVELOPMENT CORP.,KINDERCare REAL ESTATE LLC., KINDERCARE AND MS. CATHERINE RADER had a duty to use due care and caution for the minor Plaintiff.

6. That MS. CATHERINE RADER and/or other agents of one of the defendants was negligent in one or more of the following ways:

- a) Tripped and fell knocking a chair over onto the Plaintiff's head.
- b) Failed to seek immediate care for the Plaintiff and his injuries.
- c) Failure to timely notify Allyson Albrecht of her sons injuries.
- d) Were otherwise careless or negligent.

That as a direct and proximate result of the negligence of the defendants the minor Plaintiff, RORY, has suffered a seizure and, has incurred medical bills, and will incur medical bills in the future.

WHEREFORE, the Plaintiff, ALLYSON ALBRECHT, individually and as mother and best friend of RORY-MORRIS MARTIN ALBRECHT, a minor, demands judgment against one or more of the Defendants, KNOWLEDGE LEARNING CORP;

KNOWLEDGE LEARNING CENTERS, INC.; KC DEVELOPMENT CORP.; KINDERCARE REAL ESTATE LLC.; KINDERCARE AND MS. CATHERINE RADER in an amount sufficient to compensate for his injuries and medical bills in an amount in excess of One Hundred Thousand Dollars (\$100,000).



JOSEPH G. KLEST, Attorney for Plaintiff

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